

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

July 2001

Prepared for:

**Calpine Natural Gas Company
Gibson Gulch Unit #1-30
NE/NE Section 30, Township 6S, Range 91W
Garfield County, Colorado**

Prepared by:

**Buys & Associates, Inc.
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Englewood, Colorado 80110-6488
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Buysandassoc@buysandassociates.com**

**PART I
GENERAL INFORMATION**

1. Name of Facility: **Gibson Gulch Unit #1-30**
2. Type of Facility: **Tank Battery / Onshore Production**
3. Location of Facility: **NE/NE Section 30, Township 6S, Range 91W
Garfield County, Colorado**

4. Name and Address of Owner or Operator


Name: **Calpine Natural Gas Company**
Address: **1200 17th Street Suite 770
Denver, Colorado 80202**

- 4a. Designated Person Accountable for Oil Spill Prevention at Facility:

Name: **Kenneth Kuhn**
Title: **Production Foreman**

5. **MANAGEMENT APPROVAL**

This SPCC Plan will be implemented as herein described.

Signature: 
Name: **Hugo Cartaya**
Title: **Production Manager**

CERTIFICATION

I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR, Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices.

Douglas N. Henderer
Printed Name of Registered Professional Engineer

Date: 7/18/01

Signature of Registered Professional Engineer
Registration No.: 35230 State: Colorado



**PART I
GENERAL INFORMATION**

6. Has this facility experienced a reportable oil spill event since 12-11-72? Yes or No
(Please circle the answer - If YES, complete Attachment #1.)

7. Potential Spills - Prediction and Control:

SOURCE	MAJOR TYPE OF FAILURE	QUANTITY (BBLs)	RATE (BBLs/HR)	DIRECTION OF FLOW	CONTAINMENT
1-200 bbl Stock Tank	Rupture/Overflow	200	0.04	West	Berm
1-70 bbl Water Tank	Rupture/Overflow	70	0.04	West	Berm
Production Unit	Rupture/Overflow	Varies	0.04	West	None
Flowlines	Rupture/Overflow	Varies	0.04	West	None

* Rates of issuance may vary due size of orifice and pressure on vessel.

Comments:

Tank Construction Material:

Stock Tanks: Welded Steel
Water Tanks: Welded Steel

Failsafe Designs: API Standard Design

The reasonable expected modes of major failure or accident which oil could be spilled from the facility are the following:

A. Storage Tank Leak and Failure

- I. Rate of flow: Variable - depends on the size and location of the tank failure.
- II. Total quantity of oil which could be discharged: The total quantity of oil that could be discharged would not exceed the working capacity of the largest tank which is 200 barrels.

B. Tank Overflow

- I. Rate of flow: Not greater than 0.9 BOPD, based on the maximum delivery rate into tank battery array.
- II. Total quantity of oil which could be discharged: Variable. The total quantity spilled is proportional to the length of time the tank is overflowing.

PART I
GENERAL INFORMATION

C. Oil Hauling Truck Loading Area Spill

Oil at this facility is normally transported by truck. In the truck loading area, there is potential for the truck compartment to overflow while being filled. Another failure mode could occur when the loading system piping is parted or broken off during oil transfer from tank to truck compartment.

- I. Rate of flow: The flow rate, if the truck compartment overflows, is approximately 363 BOPH. The maximum rate of flow, if a loading system component is accidentally broken off while loading is approximately 363 BOPH.
- II. Total quantity of oil which could be discharged: The total quantity of oil which could be discharged is the largest compartment on a tank truck, which is not expected to exceed 212 barrels for any oil hauling truck utilized in the operation.
- III. Direction of flow: Oil spilled from a truck related failure would be limited to the loading area and would be noted immediately by truck loading personnel.

D. Treater Failure

- I. Rate of flow: Variable. Depends on the size of treater and mode of failure. Maximum possible rate of flow expected from a treater failure is 0.9 BOPD plus fluid volume of vessel above elevation of rupture.
- II. Total quantity of oil that could be discharged: Variable, depending on the rate of flow entering the treater and the location of a treater failure. The maximum potential release would not exceed the quantity noted in Section D (I).
- III. Direction of flow: Variable, depending on the location of the leak.

E. Piping Failure

- I. Rate of flow: Variable, depending on size and location of the piping related failure. Maximum expected potential rate of flow is 0.9 BOPD. Personnel routinely perform visual inspection of piping and buried flowline right-of-ways to detect any failures.
- II. Total quantity of oil that could be discharged: Variable. The total quantity spilled is proportionate to the size of the leak and the length of time the leak has gone undetected.
- III. Direction of flow: Variable, depending on the location of the leak.

8. Containment or diversionary structures or equipment to prevent oil from reaching navigable waters are practicable. (If NO, complete Attachment #2) Yes

9. Inspections and Records

- A. The required inspections follow written procedures. Yes
- B. Written procedures and records of inspections, signed by the appropriate supervisor/inspector are attached. Yes

**PART I
GENERAL INFORMATION**

The following items are inspected to minimize oil discharges from occurring; tanks for leaks and corrosion, separation vessels for leaks and corrosion, sight glasses for leaks, pumps for leakage around packing glands, lines for leaks around fittings, flowlines for leaks. A record of inspections is maintained with the SPCC Plan. If problems are identified, prompt action is taken for repairs. A record of inspection is to be kept with the SPCC Plan for at least 3 years. Attachment #4 is the written inspection procedure.

10. Personnel, Training and Spill Prevention Procedures

A. Personnel are properly instructed in the following:

- | | |
|---|-----|
| (1) Operation and maintenance of equipment to prevent oil discharges, | Yes |
| (2) Applicable pollution control laws, rules and regulations. | Yes |

Describe procedures employed for instruction:

Company and contract personnel attend in-house compliance awareness programs every year. In addition, spill related topics are discussed at safety meetings. Topics include: spill control equipment; equipment operation and maintenance; inspection of containment structures, vessels, tanks and piping; spill response containment and clean up; company policies on reporting and responding to spills and specific SPCC Plans.

B. Designated Person Accountable for Oil Spill Prevention at Facility:

Name: Kenneth Kuhn

Title: Production Foreman

C. Scheduled prevention briefings for the operating personnel are conducted frequently enough to assure adequate understanding of the SPCC Plan. Yes

Description of briefing program:

SPCC compliance awareness program is given on an annual basis. The program includes a review of specific SPCC Plans, updates on state and federal regulations, company policy and procedures and spill reporting.

Additional short briefing sessions are held as needed before and during certain jobs to review spill potential, necessary precautions and appropriate responses. Also, included in the briefing is a review of known spill events or failures, malfunctioning components and recently developed precautionary measures. A copy of the Training Record Form is attached.

**PART II, ALTERNATE B
DESIGN AND OPERATING INFORMATION
ONSHORE OIL PRODUCTION FACILITY**

A. Facility Drainage

1. Drainage from diked storage areas is controlled as follows (include operating description of valves, pumps, ejectors, etc.):

Drainage from secondary containment structures is through a drain line which has a manually operated valve. The valve is locked and bull plugged on the outside of the dike. For dikes which have no drain line, drainage of stormwater is by manual pump, automatic pump or vacuum truck. All oil and produced water is returned to separation vessels for treatment or removed to a permitted disposal facility for proper disposal. No oil or produced water is discharged into the environment.

2. The procedure for supervising the drainage of rain water from secondary containment into a storm drain or an open watercourse is as follows (include description of (a) inspection for pollutants, and (b) method of valving security). (A record of inspection and drainage events is to be maintained on a form similar to Attachment #3):

Manually operated valves on drainlines have the handle or wheel removed or locked and the line is bull plugged wrench tight. Before drainage occurs, the accumulated stormwater is visually inspected for oil. If stormwater is not contaminated, the water is discharged. If oil or produced water is present, the stormwater is not discharged but is removed by vacuum truck and transported to a permitted disposal facility. Facility personnel are present at all times during stormwater discharge. Records of each discharge will be maintained with the SPCC Plan.

3. Field drainage ditches, road ditches and oil traps, sumps or skimmers, if such exist, are inspected at regularly scheduled intervals for accumulations of oil. Yes

Describe inspection procedures, intervals and methods employed to remove oil:

Drain ditches in and around the facility and roadside ditches within the field are visually inspected by the lease operator each day they are at the facility. If pollution or evidence of a spill is detected, the source will be found and stopped. The ditch will be isolated by constructing an earthen dam or other suitable containment and the oil or other pollutant will be removed by vacuum truck or as appropriate. The material will be either reintroduced into the treatment system or transported to a permitted disposal facility.

B. Bulk Storage Tanks

1. Describe tank design, materials of construction and fail-safe engineering features:

Oil storage tanks are cylindrical in shape, constructed of steel to API specifications. Some tanks are painted to prevent corrosion. The total volume of the tanks are sufficient for normal inflow rates considering time between lease operator visits. Tanks are equipped with equalizer lines of adequate size for normal inflow rates and for overflow protection. An over pressure or relief valve may be present in addition to hatches to protect against excessive internal pressure.

2. Describe secondary containment design, construction materials and volume:

Firewalls or dikes are generally constructed of locally available soil with side slopes of approximately 45°. Volume is sufficient to contain the volume of the single largest tank plus a sufficient allowance for precipitation.

**PART II, ALTERNATE B
DESIGN AND OPERATING INFORMATION
ONSHORE OIL PRODUCTION FACILITY**

3. Describe tank examination methods, procedures and frequency of review:

Lease operators visually inspect the exterior of each tank for indication of leaks during their daily visit to the facility. In addition, they also visually examine clean-out plates, valves and connections. If an indication of a leak is found, the tank will be repaired as necessary. If repairs cannot be accomplished, the fluid inside the tank is removed and the tank is dated for repair. If valves or connections are leaking, repairs will be made as operations permit. Interior inspections for corrosion of the tank are conducted anytime the tank is out-of-service for cleaning or repair.

C. Facility Transfer Operations

1. Describe scheduled basis for examinations of aboveground valves and pipelines and salt water disposal facilities:

During daily visits, the lease operators visually inspect above ground valves, pipelines, and salt water disposal facilities for leaks for possible system upsets that could cause an oil discharge. Valves and fittings with excessive wear and damage or those which are severely corroded are replaced as operations permit.

2. Describe flowline maintenance program to prevent spills and the records kept:

The use of corrosion and/or scale inhibitor, internally and/or externally, coated and wrapped lines, cathodic protection, and hi-lo pressure shut down systems are used as indicated by expectations and/or experience. When buried flowlines are uncovered, they are inspected for signs of corrosion. If inspection of flowlines indicates corrosion, the flowline or portion of the flowline will be replaced. From time to time the flowline may be pressure tested to test the integrity of the line. The lease operator, as time permits, will walk flowlines to visually check for leaks. The pressure test and visual inspection of the flowlines will be documented on the attached flowline inspection forms.

D. Oil Drilling and Workover Facilities

1. Drilling and workover equipment is positioned or located so as to prevent spilled oil, fuel, or oily drilling fluids from reaching navigable waters. If necessary, the use of catchment basins or diversion structures will be implemented.
2. A blowout preventer (BOP) assembly and well control system is installed before drilling below any casing string and, as required during workover operations. Yes
3. The BOP assembly is capable of controlling any expected wellhead pressure. Yes
4. Casing and BOP installations conform to state regulations. Yes

**SPCC PLAN, ATTACHMENT #1
SPILL HISTORY**

Describe each spill, corrective actions taken, and plans for preventing recurrence for each spill event the facility has experienced since December 11, 1972. If the facility has had no spills, state "None" under "Date of Spill."

Date of Spill	Cause of Spill	Clean up Method	Corrective Actions Implemented to Prevent Reoccurrence

**SPCC PLAN, ATTACHMENT #2
OIL SPILL CONTINGENCY PLAN AND WRITTEN COMMITMENT OF MANPOWER**

The equipment that is bermed at this facility is noted in Part 1, paragraph 7. Secondary containment for the tank batteries are constructed, maintained and function as designed.

Secondary containment or diversionary structures are impracticable for some equipment at this facility for the following reasons:

The facility is routinely checked by lease operating personnel.

Extensive diking and/or drainage trenches would interfere with site access for normal operations and also with current surface land use.

An effective dike system would be difficult to design and to construct. Damage to vegetation and potential erosion due to construction of dikes would probably be worse than the risk adjusted environmental impact of a spill. It would also be difficult to maintain dike integrity and to drain off rain water.

Flowlines operate at much less than their rated pressure.

The dikes and trenches can trap explosive gases such as methane and hazardous vapors such as hydrogen sulfide leading to potential safety and exposure problems.

The whole well pad is not diked, nor are diversion berms used because this would trap water on location and cause muddy conditions which in turn cause corrosion and slippery, unsafe working conditions.

Cellars on wellheads are not used because they can trap water which causes corrosion and traps gases which are explosive or exposure hazards.

The most likely type release from line heaters and separation units is a pressure release from the "pop-off" valve discharging gas rather than crude oil.

Depending on site-specific conditions, the volume of oil contained in a treater or separator is insufficient to reach waters of the U.S. even in the event the total oil capacity of the treater/separator is spilled.

Other: _____

A strong contingency plan for oil spills is maintained.* **YES**

A written commitment of manpower is attached. **YES**

* Please See Calpine Natural Gas Company Contingency Plan.

MANPOWER COMMITMENT

Calpine Natural Gas Company is committed to a strong antipollution and spill prevention program. We are committed to designing and operating our facilities in a manner that will minimize the size and occurrence of spills. We are committed to a strong, pro-active training and inspection program that will insure that our facilities are operated and maintained in a manner that will prevent or minimize the occurrence of spills.

In the event of a spill, Calpine Natural Gas Company will use whatever manpower, equipment and material that will result in the spill being cleaned up in the minimum time, with a minimum of environmental damage and the maximum recovery of the spilled material practicable.

**SPCC PLAN, ATTACHMENT #3
STORMWATER INSPECTION PROCEDURE
AND
STORMWATER DRAINAGE RECORD**

Stormwater that has been collected in the firewall is visually inspected for contamination from oil. **NO** oil or produced water shall be released from or pumped from within the firewall onto the ground or into a water course. Drainage or pumping shall not occur until the fluids have been inspected for oil. Draining the stormwater from inside the firewall shall only occur under constant visual supervision of the drain outlet, and only after determining that the water is indeed fresh. Draining will cease at the first sign of an oil sheen and the remaining fluid shall be removed and properly treated or disposed. The foreman in charge of the facility operations shall be consulted before any dike is drained or purged.

As required by law, any time that stormwater is discharged from the firewall, a record of the inspection, discharge and oil removal is to be maintained. The following is the discharge record:

Date of Discharge	Oil Sheen Present	Inspector's Signature	Comments

SPCC PLAN, ATTACHMENT #4 INSPECTION PROCEDURE AND RECORD OF INSPECTION

The lease operator or roustabout gang, in the course of their normal daily routine, are responsible for inspecting the facility covered by the SPCC Plan. This daily review is to insure that the facility is operating properly and that no problems exist. In addition to daily observations made by lease personnel in their routine activities, an inspection of this facility will be conducted on an annual basis to insure that the facility is in compliance with the SPCC Plan. From time to time, a comprehensive inspection of this facility will be made by a lease inspection team and by the environmental engineer. The following is a general guideline for inspecting facilities. There may be specific items covered in the Plan that are specific to a facility and may not be covered by these general guidelines. Conversely, certain items covered by these procedures may not apply to every facility.

Federal and state regulations require that inspections are documented and the inspector must sign that the required inspections were made. The attached SPCC Inspection Log is to be used to document the annual inspections, and all other comprehensive inspections.

THE FOLLOWING ITEMS (if present) MUST BE INSPECTED:

Ditches and Waterways

Drainage ditches in and around the facility and within the field, roadside ditches, water courses, ponds, etc. will be inspected for oil accumulations and/or evidence of saltwater spills.

Above Ground Piping

Flowlines, injection lines, gathering lines, gas lift lines, and other piping in and around batteries, separation facilities, saltwater handling facilities, etc. will be inspected for leaks, evidence of leaks, and evidence of potential leaks. Lines along roads will be inspected while driving through the field. Other above ground lines will be walked periodically.

Tanks

All liquid storage tanks, except fresh water tanks, (including crude oil, saltwater, glycol, methanol, fuel, treatment chemicals, lube oil, etc.) and associated piping will be visually inspected for leaks, overflows, and signs of potential problems. Special emphasis will be placed on the inspection of bottom seams, patches, flanges, piping connections, sight-glasses, and other openings. Valves should be in their proper position and locked or sealed, if required.

Firewalls

Earthen firewalls will be inspected for adequate capacity, erosion and leaks. Cement firewalls will be inspected for leaks, cracks, or other signs of failure. Accumulations of liquid will be removed from the firewall. If the liquid is from one of the tanks, the source will be found and repaired. Rainwater will be removed as soon as feasible after rain.

If a firewall is equipped with a drain, the drain **MUST** be closed, sealed and locked when not in use. The drain must be manned whenever it is in use. Each drainage event must be recorded. The SPCC Log may be used for this record.

**SPCC PLAN, ATTACHMENT #4
INSPECTION PROCEDURE AND RECORD OF INSPECTION**

Line Heaters, Separators, Heater Treaters and Glycol Units

These pieces of production equipment should be visually inspected for leaks, especially around valves, fittings, inspection plates and sight glasses. Vents on glycol units should be inspected for excessive liquid carryover. Glycol units must discharge into some sort of container, not to the ground.

Pits

Pits must be empty except when in use. Any accumulation of rainwater or produced fluids must be removed from the pit and properly disposed.

Pit Liquid Level

When in use, the liquid level must not be within one (1) foot of overflowing. Liquid hydrocarbons shall not accumulate in a pit.

Sumps, Sump Level Controls and Sump Pumps

The sump system should be checked to insure that the liquid level is acceptable and to insure that it is operating properly.

Drains

Drains should be inspected for blockage and accumulation of debris that would impede the free flow of liquids.

Chemical Storage Tanks, Pumps and Piping

Chemical injection systems should be inspected for leaks, especially around storage tanks, pumps and fittings on tubing or piping.

Lube Oil Systems

Lube oil storage tanks and the piping systems should be inspected, especially around tanks, pumps and fittings on the piping or tubing.

Flare System

Any liquid handling system associated with a flare system, liquid knock-outs, etc., should be inspected.

The flare ignition system should be checked periodically. Any evidence of liquid carryover should be reported and the cause repaired. If liquid carryovers are frequent, containment should be constructed to contain the carryover.

**SPCC PLAN, ATTACHMENT #4
INSPECTION PROCEDURE AND RECORD OF INSPECTION**

Drain Pans or Drip Pans

The liquid level in drip or drain pans should be checked and emptied as necessary.

Pressure Relief Valves

Pressure relief valves should be checked for leaks, evidence of leaks and signs of failure.

Plant Process Heaters

Plant process heaters should be checked for leaks, evidence of leaks and signs of failure. The stack should be checked for visible smoke emissions.

Alarm Systems

All alarm systems should be tested periodically for proper function.

Rainwater Removed from Firewalls

All discharges of rainwater from firewalls to drainage **MUST BE RECORDED**. The date of discharge must be noted on the SPCC Inspection Log.

Prior to discharge, the water must be visually inspected for the presence of oil and tested for the presence of saltwater. If either is present, the water cannot be discharged and must be disposed of in a permitted disposal system or other acceptable manner.

Over Water Platforms

Platforms, decks and curbing must be impervious. Decks and curbing must be inspected for cracks and holes. Particular attention should be paid around seams and where piping goes through the deck or curbing. All drainage must be to a sump. Drains should be inspected for debris and obstructions. Drain pipes should be inspected for leaks. Special attention should be paid to unions and joints.

Sumps should be inspected for accumulations of oil. Excess oil should be removed and disposed of properly. Discharges from sumps should be visually inspected for an oil sheen.

SPCC FACILITY INSPECTION FORM

(Note that any "NO" response requires corrective actions, circle the appropriate response)

I. Wellsite Inspections

- A. All shut-in wells should have 0 psi at the wellhead and tree: Yes / No
- B. All wellhead and tree connections should be leak free: Yes / No
- C. All active wells should have their master valves operating and serviced to assure they function: Yes / No

II. Flowline Inspections

- A. All active flowlines should be leak free: Yes / No
- B. All active flowlines should have a gauge installed to monitor pressure: Yes / No
- C. Any clamp-type repairs on active flowlines should be visually inspected: Yes / No

III. Process Equipment Inspections

- A. All incoming flowlines (active and inactive) should be identified: Yes / No
- B. Shut down valves are checked for fail-safe closure: Yes / No
- C. Header/manifold systems, process vessels and their interconnecting piping should be leak-free: Yes / No
- D. All automatic dump valves should be checked for fail-safe closure: Yes / No
- E. Operating pressures on process vessels should be at or below the vessel's rated working pressure: Yes / No

IV. Tank Battery Inspection

- A. All bulk storage tanks and their related piping are leak-free: Yes / No
- B. Secondary containment system is intact and competent: Yes / No
- C. All pressure/vacuum reliefs and atmospheric tank vents are operational: Yes / No
- D. Rainwater drain valve is kept in the closed position: Yes / No

V. General Site Inspection

- A. Facility identification and emergency telephone number is posted: Yes / No
- B. Facility has restricted access through fence, gate and cattle guard: Yes / No
- C. Facility is graded to drain rainwater away to natural watercourses: Yes / No

SPCC FACILITY INSPECTION FORM

VI. Corrective Actions

VII. Verification

A. Original Inspection

By: _____

Title: _____

Date: _____

B. Corrective Actions

By: _____

Title: _____

Date: _____

VIII. Distribution of this Form

A. Original Field Records

B. FAX Copy - EHS Department

TRAINING RECORD FORM

DATE: _____ TRAINER: _____

SUBJECT: _____

ATTACH COPIES OF ALL HANDOUTS ETC.

[illegible]

CONTRACTOR RESPONSIBILITIES

INSTRUCTIONS TO CONTRACTORS

1. Pollution control will be maintained at all times in connection with all operations by contractor. Calpine Natural Gas Company personnel will be notified immediately of any emitting, spilling, venting, discharging, disposal or loss of any hazardous or harmful substances, air contaminants and/or pollutants of any nature (referred to as discharges).
2. If any discharges occur as a result of the performance of work by contractors, its agents, employees and subcontractors, or persons for whom it is responsible, contractor will immediately proceed to stop or abate such discharges.
3. Contractor will comply with any and all local, state and federal laws, regulations, standards and orders applicable to the controlling and prevention of discharges.
4. Contractors will install and maintain adequate discharge control equipment on or about its plant, rig or equipment to prevent "discharges, in violation of any local, state and federal laws, regulations, standards and orders."

**SPCC NOTIFICATION LISTS
LOCAL SURFACE WATER LIST
CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION FORM
SITE PLAN
USGS TOPOGRAPHIC MAP**

SPCC NOTIFICATION LIST

Calpine Natural Gas Company

Kenneth Kuhn/Production Foreman

Mobile: 970-904-1970

Office: None

Home: 970-285-9397

Derick Johnson/Contract Pumper

Mobile: 970-986-5690

Office: None

Home: 970-285-9346

Hugo Cartaya/Production Manager

Office: 720-359-9144

Home: 303-973-3440

Mobile: 303-669-7538

SPCC NOTIFICATION LIST

STATE AGENCIES

Colorado Oil & Gas Conservation Commission: 303-894-2100
Colorado Department of Public Health and Environment: 303-692-2000

FEDERAL AGENCIES

National Response Center: 1-800-424-8802
EPA Region VIII: 303-312-6312 (Working Hours) 1-800-227-8914 (24-Hour)
Grand Junction: 970-250-5735

LOCAL FIRE DEPARTMENTS

Burning Mountain Fire Department: 970-876-2353
Emergency Central Dispatch (If Available - Local Calls Only) : 911

EMERGENCY RESPONSE CONTRACTORS

Teeter & Sons: 970-250-6234
Vacuum Truck Services, Backhoe & Spill Cleanup Services

LOCAL SURFACE WATER LIST

Nearby Lakes, Rivers, Streams Include:

1. Intermittent stream .02 miles south.
 2. None.
 3. None.
 4. None.
- Call should oil spill exceed 5 barrels or saltwater spill exceed 100 barrels, "anywhere."
 - Call should oil spill enter waterway.

CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION

Operator Name: Calpine Natural Gas Company
Facility Name: Gibson Gulch Unit #1-30
Facility Legal Description: NE/NE Section 30, Township 6S, Range 91W
Garfield County, Colorado

1. Does the facility have a maximum storage capacity greater than or equal to 42,000 gallons and do the operations include over water transfers of oil to or from vessels?

YES _____ NO X _____

2. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the facility without secondary containment for each aboveground storage area sufficiently large to contain the capacity of the largest aboveground storage tank within the storage area?

YES _____ NO X _____

3. Does the facility have the maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the facility located at a distance (as calculated using the appropriate formula in attachment C-III to Appendix C of Part 112 or a comparable formula) such that a discharge from the facility could cause injury to an environmentally sensitive area defined in Appendix D?

YES _____ NO X _____

4. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the facility located at a distance (as calculated using the appropriate formula in attachment C-III to Appendix C of Part 112 or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?

YES _____ NO X _____


5. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and within the past 5 years, has the facility experienced a reportable spill in an amount greater than or equal to 10,000 gallons?

YES _____ NO X _____

- * If an alternative formula is used, documentation of the reliability and analytical soundness of the alternative formula must be attached to this form.

CERTIFICATION

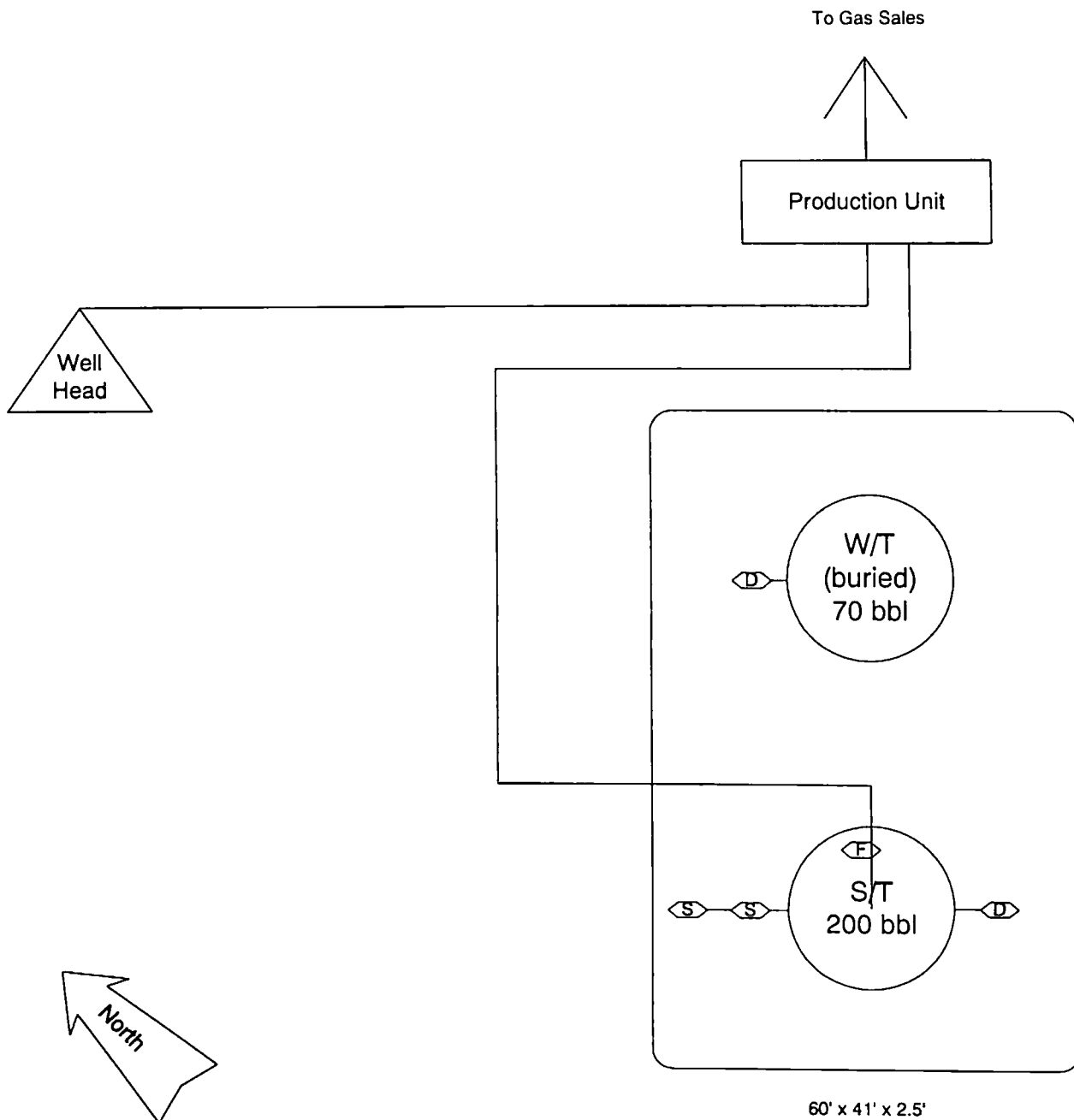
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.



Signature
Hugo Cartaya
Name (Please type or print.)

7/20/01

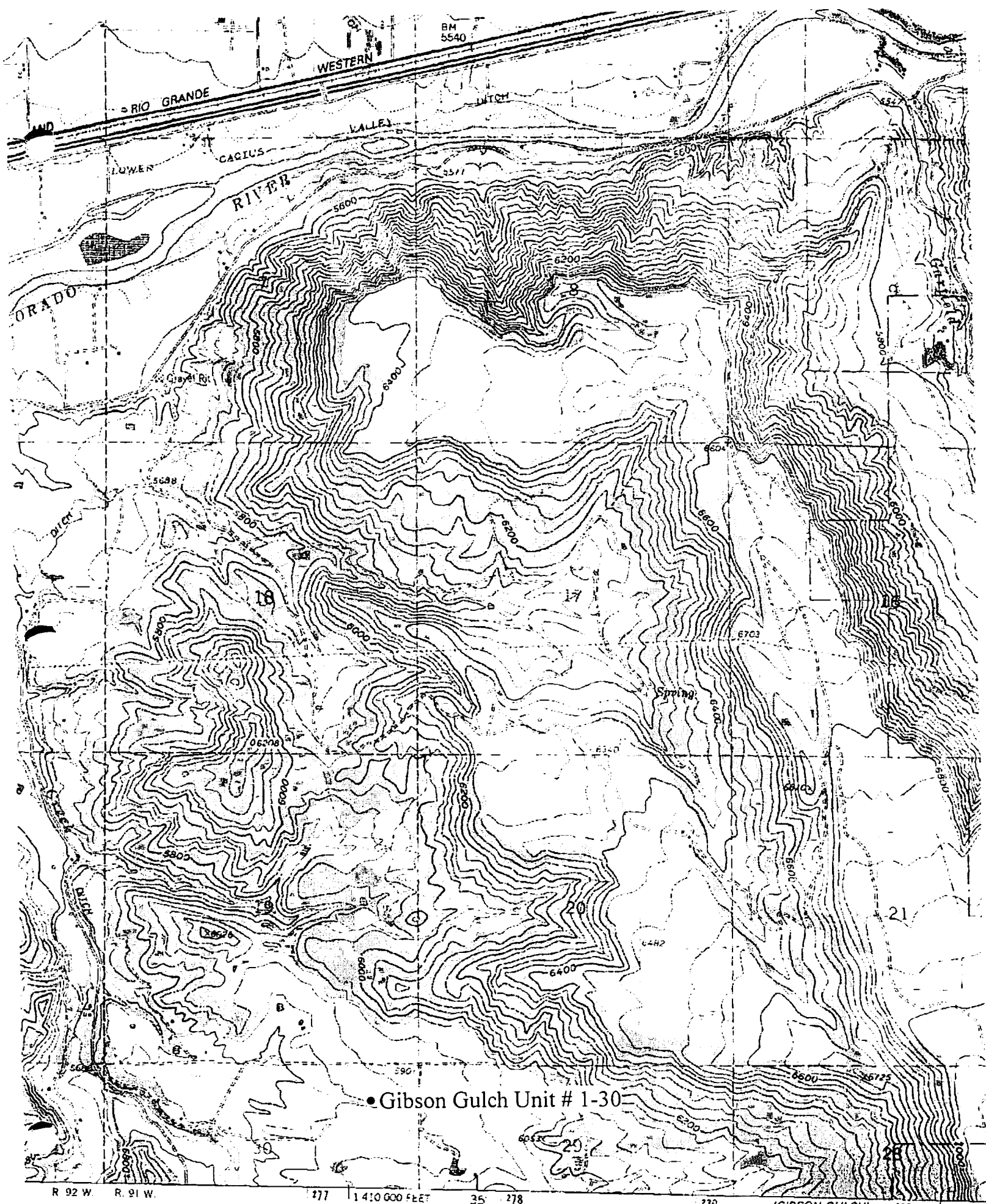
Date
Production Manager
Title



This lease is subject to the Site Security Plan for Calpine Natural Gas Company. The Plan is located at:
 Calpine Natural Gas Company
 1200 17th Street,
 Suite 770
 Denver, CO 80202

BUYS & ASSOCIATES, INC.
ENVIRONMENTAL CONSULTANTS

Calpine Natural Gas Company
 Gibson Gulch Unit # 1-30
 NE/NE Sec. 30, Twp. 6 S, Rge. 91 W
 Garfield County, Colorado
 July 2001



the Geological Survey

• Gibson Gulch Unit #12-29A & 9-30A Tank Battery

'New Castle, CO'; Scale: 1" = 0.379Mi 610Mt 2,000Ft, 1 Mi = 2.640" , 1 cm = 240Mt